M045 0002
cc: Paul
Doug

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Utah State Office
P.O. Box 45155
Salt Lake City, UT 84145-0155
http://www.blm.gov

TAKE PRIDE IN AMERICA

MAY 15 2006

IN REPLY REFER TO:
UTU-087809
3590
(UT-923)

CERTIFIED MAIL--Return Receipt Requested

Mr. Greg Foy
P.O. Box 580
Wendover, Utah 84083

Re: Mining Plan Federal Potash Lease UTU-087909-UTU-087818

Dear Mr. Foy:

BLM received your "Draft" Mining Plan dated September 21, 2005. BLM has reviewed your submission and has the following comments.

General Comments:

1. The plan must contain a discussion of a methodology for obtaining a salt balance. There shall be an accounting for all salts from all the input sources from federal and fee. There should also be an accounting for all the losses. This should be accomplished for each stage of the process.
2. Mineral Waste Disposal. The plan needs to specifically address the disposal of wastes resulting from the mining, reduction, concentration, or separation of mineral substances. Included in this should be the amount of salt that will be moved from Federal lands to the fee lands. The salt laydown process should be part of this discussion. There needs to be more than a historical prospective as currently stated in the plan.
3. There should be a discussion of isolation between the upper and lower brine aquifer.
4. Produced tonnage monitoring. A drawing of loading systems is required along with the location of the scales or pumps showing how much material have been loaded. There should be a description of the scales and pumps and the frequency of calibration.

RECEIVED
MAY 17 2006
DIV. OF OIL, GAS & MINING

5. Pond V is being transitioned from a primary pond to a production area. More information is necessary on the characteristics of pond V. These characteristics should include the amount of salt deposited, amount and quality of brine entrained in the salt.
6. There needs to be more of a discussion about the alluvial fan aquifer wells. This discussion should include but not be limited to the following.
    a. Location, size and depth, of the wells
    b. Number of wells operating and not operating. (If the wells are not operating then the status of the wells should be discussed. This may include if the wells are plugged, caved etc.
    c. How the wells are completed
    d. The right-of-way boundary(s) and the ditch size
    e. Ditch and retention locations
    f. Pump size and utility access
    g. Annual discharge quality and quantity
7. The plan is required to have, Names addresses and telephone numbers of those responsible for operations and a list of Federal leases and other authorizations.
8. An explanation of how Ultimate Maximum Recovery will be achieved (43 CFR3590.0-5 (h)).
9. The plan maps are required to show Federal lease boundaries, mineral and surface ownership.
10. Estimate of quantity of water to be used. (This should be addressed as alluvial fan aquifer water for the laydown and plant/pond operations.
11. Estimated mineral recovery.
12. Measures for controlling fires, soil erosion, surface and ground water pollution, pollution of air, damage to fish or wildlife or other natural resources, hazards to public health and safety.
13. Waste disposal. This should include trash, solid waste, hazardous waste, spill plans etc.
14. Some of the production ditches in T. 3 S. R. 19 W. Section 1, T. 3 S. R. 18 W. Section 6, T. 2 S. R. 18 W. Sections 20 and 29 are in violation of the 500 foot boundary limit (43 CFR 3594.5 (c) which states, "Where minerals area taken from the earth in solution, such extraction shall not be within 500 feet of the boundary line of lands contained in an approved mine plan without the written permission of the authorized officer."
15. The maps do not differentiate between a collection and a transfer ditch.
16. All Figures need darker lines and arrows showing the flow of the brine.
17. There is no discussion of the material utilized in some summer months to increase evaporation.
18. All rights-of-ways should be addressed as part of the mining plan. These would include UTSL-062417 (Potable water), UTSL-066769 (Pipe from alluvial fan aquifer), UTSL-064788 (Wells Rural Elect Company for power), UTU-074087 (Salt Laydown).
19. The plan should contain a description of the new wells installed and a description of the data that will be obtained from them. There should also be a description of what the data will be used for. Any analysis that is accomplished should be given to the Government.
20. A plan is required to show depletion of the resource on and off lease. This could include monitoring some wells on the Salt Flats.

Specific Comments:

1. Page 5, Paragraph 2.2.3 Climate. Comment: The phrase orthographic effect is used. We believe the phrase should be orographic effect.
2. Page 11, Paragraph 3.1.1. Information on pump station number 2 should be included. There should be a narrative on the locations of pump station number 3 and pump station number 5 for ease of reading. The table should define if the percent is by weight or by volume.
3. Figure 10. The range of distances from the ditch to the spoil pile should be given.
4. Figures 16 and 17. These are inadequate and do not show all the present ditches.
5. Page 14. The depth of the deep brine well should be stated to show that it is located in a different aquifer.
6. Page 20, Paragraph 4.1 there needs to be a reference to a diagram of the North and South ripening ponds. Maybe a quick flow chart showing the sequence of the ponds should be located at this point.
7. Page 23. There should be a discussion of the KCL content prior to the Magnesium Chloride dropping out of the solution.
8. Page 26. Is the phrase "Primary Pump Station 5" correct?
9. Page 27. The plan states that there is 1500 tons per day that goes through the mill. This number needs to be defined. Does this mean that there is 547,500 tons per year that is put through the mill? Once the number is defined then the output of Potash should be shown with its average K percent.
10. Figure 21. This does not seem to match p. 27. For example: There are no attrition cells and the surge bins are missing on the figure.
11. Page 29. the phrase, "The leached concentrate slurry leaves the last leach tank at a density of 25%". The phrase percent density is confusing. Is the correct phrase, percent solids? If it is not percent solids then it should be defined.

If you require further information please contact Mr. Stan Perkes, (801) 539-4036.

Sincerely,

James F Kohler

James F. Kohler
Chief, Solid Minerals Branch

cc: Salt Lake Field Office, Larry Garaha\na, Bill White
Utah Division of Oil, Gas, and Mining (Attn. Doug Jensen)
Mine Files - UTU-087809

Intrepidmineplancomments 5-10-06 sp-sa